

# MusickPeeler

ATTORNEYS AT LAW  
ONE WILSHIRE BUILDING  
624 SOUTH GRAND AVENUE, SUITE 2000  
LOS ANGELES, CALIFORNIA 90017-3383  
TELEPHONE (213) 629-7600  
FACSIMILE (213) 624-1376

Dan Woods (State Bar No. 78638)  
*d.woods@musickpeeler.com*  
Adam M. Weg (State Bar No. 269320)  
*a.weg@musickpeeler.com*

Attorneys for J.G. BOSWELL COMPANY

## UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

TRADELINE ENTERPRISES PVT.  
LTD.,

Plaintiff,

vs.

JESS SMITH & SONS COTTON,  
LLC; and J.G. BOSWELL COMPANY,

Defendant.

CASE No. 2:15-CV-8048-JAK  
(RAOx)

### NOTICE OF FINAL ARBITRATION AWARD

1 Defendants Jess Smith & Sons Cotton, LLC ("Jess Smith") and J.G. Boswell  
2 Company ("Boswell") respectfully submit this Notice pursuant to the Court's Order  
3 dated April 25, 2018 (Dkt. 75).

4 Tradeline filed its Demand for Arbitration with the American Arbitration  
5 Association ("AAA") on September 9, 2016. On October 21, 2016, Jess Smith,  
6 Boswell, and the Supima Association ("Supima"), a non-party in this action,  
7 answered.

8 Pursuant to the March 15, 2017, Procedural Order No. 1 in the arbitration,  
9 Tradeline filed its Statement of Claim on May 15, 2017. Jess Smith, Boswell, and  
10 non-party Supima filed their Statements of Defense on August 1, 2017. Tradeline  
11 filed its Statement of Reply on November 10, 2017. Jess Smith, Boswell, and  
12 Supima filed their Statements of Rejoinder on December 22, 2017. The parties and  
13 Supima filed their respective Skeleton Arguments on February 20, 2018.

14 The Witness Hearing commenced February 26, 2018 and concluded March 3,  
15 2018. The parties and Supima filed their respective fees and costs submissions on  
16 March 19, 2018 and filed their responses to costs and fees submissions on April 2,  
17 2018.

18 On May 11, 2018, the Chairman of the Tribunal, J. William Rowley QC,  
19 served all parties with the unanimous final arbitration award of the three-arbitrator  
20 Tribunal. The final award is as follows: (1) Each of Tradeline's claims against  
21 Boswell, Jess Smith, and Supima is dismissed; (2) Tradeline shall pay \$2,129,000 to  
22 Boswell as reimbursement for Boswell's costs of the arbitration, with compound  
23 interest accruing on that sum at the rate of 6% per annum, compounded every six  
24 months, from the date of the award until paid in full; (3) Tradeline shall pay  
25 \$3,525,000 to Jess Smith as reimbursement for Jess Smith's costs of the arbitration,  
26 with compound interest accruing on that sum at the rate of 6% per annum,  
27 compounded every six months, from the date of the award until paid in full; (4)  
28 Tradeline shall pay \$3,280,000 to Supima as reimbursement for Supima's costs of

1 the arbitration, with compound interest accruing on that sum at the rate of 6% per  
 2 annum, compounded every six months, from the date of the award until paid in full;  
 3 and (5) in addition to paying each of the Respondents' attorney's fees and costs,  
 4 Tradeline is to bear all of its own costs and attorney's fees in the arbitration and to  
 5 pay an additional \$50,700 for the administrative fees and expenses of the  
 6 international arm of AAA, the ICDR.

7 Boswell and Jess Smith will forthwith file and serve a motion for an order  
 8 confirming the final award, entering judgment in conformity with the award, and  
 9 awarding any other appropriate relief.

10  
 11 Dated: May 17, 2018

12 **MUSICK, PEELER &  
 13 GARRETT LLP**

14 By: /s/ Dan Woods.

15 Dan Woods, SBN 78638  
 16 Adam M. Weg, SBN 269320  
 17 624 S. Grand Ave., Suite 2000  
 18 Los Angeles, CA 90017  
 19 Phone: (213) 629-7600  
 20 Attorneys for J. G. Boswell Company

21  
 22 Dated: May 17, 2018

23 **STOEL RIVES LLP**

24 By: /s/ Edward C. Duckers.

25 Edward C. Duckers, SBN 242113  
 26 Three Embarcadero Center, Suite 1120  
 27 San Francisco, CA 94111  
 28 Telephone: (415) 617-8900  
 Attorneys for Jess Smith & Sons Cotton,  
 LLC

**PROOF OF SERVICE****STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is One Wilshire Boulevard, Suite 2000, Los Angeles, CA 90017-3383.

On May 17, 2018, I served true copies of the following document(s) described as **NOTICE OF FINAL ARBITRATION AWARD** on the interested parties in this action as follows:

**SERVICE LIST**

Dominic Surprenant, SBN 165861  
 Michael L. Fazio, SBN 228601  
 Paul Slattery, SBN 285291  
 QUINN EMANUEL URQUHART  
 & SULLIVAN, LLP  
 865 South Figueroa Street, 10th Floor  
 Los Angeles, California 90017-2543  
 Tel: (213) 443-3000  
 Fax: (213) 443-3100  
[ds@quinnemanuel.com](mailto:ds@quinnemanuel.com)  
[michaelfazio@quinnemanuel.com](mailto:michaelfazio@quinnemanuel.com)  
[paulslattery@quinnemanuel.com](mailto:paulslattery@quinnemanuel.com)

Attorneys for Plaintiff  
 TRADELINE ENTERPRISES PVT, LTD.

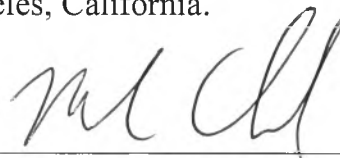
Edward C. Duckers, SBN 242113  
 Michael B. Brown, SBN 179222  
 Jonathan A. Miles, (SBN 268034  
 STOEL RIVES LLP  
 Three Embarcadero Center, Suite 1120  
 San Francisco, CA 94111  
 Tel: (415) 617-8900  
 Fax: (415) 617-8907  
[ed.duckers@stoel.com](mailto:ed.duckers@stoel.com)  
[michael.brown@stoel.com](mailto:michael.brown@stoel.com)  
[jonathan.miles@stoel.com](mailto:jonathan.miles@stoel.com)

Attorneys for Defendant  
 JESS SMITH & SONS COTTON, LLC

**BY CM/ECF NOTICE OF ELECTRONIC FILING:** I electronically filed the document(s) with the Clerk of the Court by using the CM/ECF system. Participants in the case who are registered CM/ECF users will be served by the CM/ECF system. Participants in the case who are not registered CM/ECF users will be served by mail or by other means permitted by the court rules.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on May 17, 2018, at Los Angeles, California.



Mark Clark